

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA**

Plaintiff,

vs.

**EDVANTIC, INC. ET AL.**

Defendants.

**CIVIL ACTION**

**No. 2:21-cv-01135-PBT**

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

Plaintiff, Trustees of the University of Pennsylvania, by its agent the Aresty Institute of Executive Education of the Wharton School ("Plaintiff" or "Wharton"), hereby files this Motion for Default Judgment against defendants Edvantic, Inc. ("Edvantic"); TMI-Wharton Programs ("TMI"); CredForce America, Inc. ("CredForce"); and Rajiv Gupta ("Gupta", collectively, "Defendants") pursuant to Federal Rule of Civil Procedure 55(b). For the reasons set forth in the attached Memorandum of Law and Declaration, Wharton respectfully requests that the Court enter a default judgment for \$700,000 in favor of Plaintiff and against Defendants, jointly and severally, a permanent injunction as set forth in the proposed order, order an accounting of Defendants, and such other relief that the Court may determine is fair and just.

Respectfully submitted,

SIRLIN LESSER & BENSON, P.C.

/s/ Patrick J. Troy  
Patrick J. Troy (PA Id. 89890)  
123 South Broad Street, Suite 2100  
Philadelphia, PA 19109  
*Attorneys for Plaintiff*

Dated: May 6, 2021